

Northeast
Utilities System

107 Selden Street, Berlin, CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(203) 665-5000

December 16, 1994

Docket No. 50-336
B14203

Re: 10CFR50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit No. 2
Proposed Revision to Technical Specifications
Service Water Pump Flood Protection

Pursuant to 10CFR50.90 Northeast Nuclear Energy Company (NNECO) hereby proposes to amend its Operating License No. DPR-65 by incorporating the attached proposed changes into the Technical Specifications of Millstone Unit No. 2. The principal purpose of this proposed license amendment is to revise the Millstone Unit No. 2 Technical Specifications, so that the operator actions regarding flood protection are consistent for each of the units at the Millstone Nuclear Power Station. Specifically, NNECO proposes to revise Limiting Conditions for Operation (LCOs) 3.7.5.1.b.3 and 3.7.5.1.b.4 of the Millstone Unit No. 2 Technical Specifications by changing the elevation that the average wind speed and average wind direction are measured. Also, NNECO proposes to correct a typographical error on Table 3.3-8 of the Millstone Unit No. 2 Technical Specifications.

These proposed changes are discussed in detail below. The marked-up technical specification pages are provided in Attachment 1, and the retyped technical specification pages are provided in Attachment 2.

Background

The Millstone Nuclear Power Station meteorological program meets the requirements of NRC Regulatory Guide (RG) 1.23 (originally issued as Safety Guide 23). This RG requires wind conditions to be monitored at 10 meters above grade (approximately 33 feet) and at elevations where potentially radioactive releases could occur. Wind speed and direction measurements are currently monitored at four elevations above the meteorological tower base. These elevations are 33 feet, 142 feet, 374 feet, and 447 feet. Elevation 142 feet approximates the plant vent heights for both Millstone Unit Nos. 2 and 3. Elevation 374 feet corresponds to the height of the Millstone Unit No. 1 stack.

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Millstone Nuclear Power Station operating and emergency plan procedures for all three units require wind data to be taken from the elevation 142-foot sensors to determine actions required to preclude flood damage during severe weather conditions. The Millstone Unit No. 2 service water pump motors are normally protected against water damage up to an elevation of 22 feet (plant grade level). If the water level is exceeding plant grade level, or if a severe storm is approaching the plant site, one service water pump motor will be protected against flooding to a minimum elevation of 28 feet to ensure that this pump will continue to be capable of removing decay heat from the reactor. In order to ensure operator accessibility to the intake structure, action to provide pump motor protection is initiated when the water level reaches plant grade level.

Description of Proposed Changes

NNECO proposes to revise LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 of the Millstone Unit No. 2 Technical Specifications by changing the elevation that the average wind speed and average wind direction are measured. Also, NNECO proposes to correct a typographical error on Table 3.3-8 of the Millstone Unit No. 2 Technical Specification.

Currently, the Millstone Unit No. 2 Technical Specifications require average wind speed and average wind direction measurements be taken at elevation 389 feet above Mean Sea Level (MSL) on the meteorological tower. An elevation of 389 feet MSL corresponds to the instruments located at an elevation of 374 feet above the base of the tower, because the base of the tower is located at an elevation of 15 feet MSL. NNECO is proposing to change the measurement location to an elevation of 142 feet above the base of the tower. The proposed changes will permit the operator actions regarding flood protection to be consistent for each of the units at the Millstone Nuclear Power Station.

NNECO proposes to correct a typographical error on Table 3.3-8 of the Millstone Unit No. 2 Technical Specification. This error was introduced in Amendment No. 45 to the Facility Operating License for Millstone Unit No. 2.⁽¹⁾ The nominal elevation for entry 3.b of Table 3.3-8 should be 374 feet not 347 feet.

(1) R. W. Reid letter to Northeast Nuclear Energy Company, Amendment Nos. 56 and 45 to Provisional Operating License No. DPR-21 and Facility Operating License No. DPR-65, respectively, for the Millstone Nuclear Power Station, Unit Nos. 1 and 2, December 8, 1978.

Safety Assessment

The proposed changes to LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 of the Millstone Unit No. 2 Technical Specifications will permit the use of instruments at the 142-foot elevation to monitor wind speed and wind direction in order to predict the potential of a major storm and flooding. They do not involve any physical modifications to structures, systems, or components. A review of Section 2.5.4.2.1 of the Millstone Unit No. 2 Final Safety Analysis Report (FSAR), applicable procedures, and docketed correspondence did not identify any technical need to take wind data for Millstone Unit No. 2 from a different elevation than that used for Millstone Unit Nos. 1 and 3.

The change to lower the measurement of wind speed and wind direction from the 374-foot elevation to the 142-foot elevation is less conservative since wind speeds tend to be greater at higher elevations. Hence, the frequency of a meteorological event which would trigger the required actions is being reduced. However, NNECO's proposal to use the same trigger value of 60 miles per hour for wind speed is consistent with that used for each of the other Millstone units to take precautionary steps for a severe storm. Millstone Unit Nos. 1 and 3 use plant procedures to trigger actions for flood protection based on storm wind speed or forecasted storm track projection.

The proposed changes will permit the operator actions regarding flood protection to be consistent for each of the units at the Millstone Nuclear Power Station. The on-site meteorological program at Millstone Station meets the requirements of Regulatory Guide 1.23 (originally issued as Safety Guide 23). The Regulatory Guide requires wind conditions be monitored at 10 meters above grade (approximately 33 feet) and at elevations where potentially radioactive releases could occur. Currently, wind speed and direction measurements are monitored at four elevations above the meteorological tower base (33 feet, 142 feet, 374 feet, and 447 feet). The 142-foot elevation approximates the plant vent heights for both Millstone Unit Nos. 2 and 3. The 374-foot elevation corresponds to the height of the Millstone Unit No. 1 stack.

In summary, the slight reduction in margin in measuring wind speed and wind direction does not change the actions Millstone Unit No. 2 would take for an approaching storm. Furthermore, the proposed change is consistent with the actions previously accepted by the NRC Staff for Millstone Unit Nos. 1 and 3.

Significant Hazards Consideration

NNECO has reviewed the proposed changes in accordance with 10CFR50.92, and has concluded that the changes do not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve a significant hazards consideration because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed.

NNECO is proposing to revise LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 and Table 3.3-8 of the Millstone Unit No. 2 Technical Specifications by changing the elevation that the average wind speed and average wind direction are measured and by correcting a typographical error, respectively. The proposed changes have no effect on any of the accidents analyzed in Chapter 14 of the Millstone Unit No. 2 FSAR. Site flooding is considered in Section 2.5.4.2.1 of the FSAR. Utilizing the wind speed indicator at the 142-foot elevation, in lieu of the indicator on the 374-foot elevation will not significantly change the ability of personnel to predict the potential for a major storm with flooding.

The proposed changes do not alter the intent of the surveillances, do not involve any physical changes to the plant, do not alter the way any structure, system, or component functions, and do not modify the manner in which the plant is operated.

Based on the above, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously analyzed.

2. Create the possibility of a new or different kind of accident from any previously analyzed.

NNECO is proposing to revise LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 and Table 3.3-9 of the Millstone Unit No. 2 Technical Specifications by changing the elevation that the average wind speed and average wind direction are measured and by correcting a typographical error, respectively. The proposed changes do not alter the intent of the surveillances, do not involve any physical changes to the plant, do not alter the way any structure, system, or

component functions, and do not modify the manner in which the plant is operated.

While the proposed changes to LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 do change the measurement location stipulated by the technical specifications, this change is insignificant. Utilizing the wind speed indicator at the 142-foot elevation, in lieu of the indicator on the 374-foot elevation will not significantly change the ability of personnel to predict the potential for a major storm with flooding.

Based on the above, the proposed changes do not create the possibility of a new or different kind of accident from any previously analyzed.

3. Involve a significant reduction in a margin of safety.

NNECO is proposing to revise LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 and Table 3.3-8 of the Millstone Unit No. 2 Technical Specifications by changing the elevation that the average wind speed and average wind direction are measured and by correcting a typographical error, respectively. The proposed changes will have no impact on the physical protective boundaries (fuel matrix/cladding, reactor coolant system pressure boundary, and containment). The proposed changes do not alter the intent of the surveillances, do not involve any physical changes to the plant, do not alter the way any structure, system, or component functions, and do not modify the manner in which the plant is operated.

While the proposed changes to LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 do change the manner in which potential flooding is predicted, this change is insignificant. Utilizing the wind speed and direction indicators at the 142-foot elevation, in lieu of the indicators at the 374-foot elevation will not significantly change the ability of personnel to predict the potential for a major storm with flooding.

Based on the above, the proposed changes do not involve a significant reduction in a margin of safety.

The Commission has provided guidance concerning the application of standards in 10CFR50.92 by providing certain examples (March 6, 1986, 51 FR 7751) of amendments that are considered not likely to involve a significant hazards consideration. While the proposed changes to LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 are not

enveloped by any of the examples, correcting the typographical error in Table 3.3-8 is enveloped by example (i), a purely administrative change to technical specifications. The proposed changes to LCOs 3.7.5.1.b.3 and 3.7.5.1.b.4 result in an insignificant change to the manner in which potential flooding is predicted. Utilizing the wind speed and direction indicators at the 142-foot elevation, in lieu of the indicators at the 374-foot elevation will not significantly change the ability of personnel to predict the potential for a major storm with flooding.

These proposed changes do not constitute a significant hazards consideration, because they do not alter the intent of the LCO, do not involve any physical changes to the plant, do not alter the way any structure, system, or component functions, and do not modify the manner in which the plant is operated.

Environmental Consideration

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, do not increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

Nuclear Review Board Review

The Millstone Unit No. 2 Nuclear Review Board has reviewed the proposed amendment and has concurred with the above determination.

Proposed Schedule for License Amendment Issuance

This request is not necessary for continued plant operation and as such no specific schedule for approval and issuance is requested. However, it is appropriate that this change be implemented within thirty days of issuance of the license amendment.

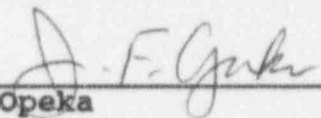
In accordance with 10CFR50.91(b), we are providing the State of Connecticut with a copy of this proposed amendment.

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Should the NRC Staff have any questions regarding this submittal,
please contact us.

Very truly yours,

NORTHEAST NUCLEAR ENERGY COMPANY



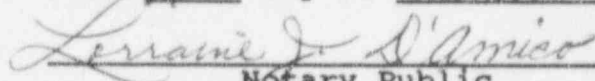
J. F. Opeka
Executive Vice-President

cc: T. T. Martin, Region I Administrator
G. S. Vissing, NRC Project Manager, Millstone Unit No. 2
P. D. Swetland, Senior Resident Inspector, Millstone Unit
Nos. 1, 2, and 3

Mr. Kevin T.A. McCarthy, Director
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
P.O. Box 5066
Hartford, Connecticut 06102-5066

Subscribed and sworn to before me

this 16th day of December, 1994



Notary Public

Date Commission Expires: 3/31/95